

TROOPER MATTHEW WYSOCKY  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTY

October 01, 2020

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Page 1		Page 3	
1	IN THE UNITED STATES DISTRICT COURT	1	- - -
2	FOR THE EASTERN DISTRICT OF PENNSYLVANIA	2	I N D E X
3	- - -	3	- - -
4	ADA ANGLEMEYER, et al. : CIVIL ACTION	4	
5	:	5	Testimony of: TROOPER MATTHEW WYSOCKY
6	v. :	6	By Mr. Zeiger 6, 67, 70
7	:	7	By Mr. Bradford 62, 69
8	NORTHAMPTON COUNTY : NO. 19-3714	8	- - -
9	- - -	9	E X H I B I T S
10	October 1, 2020	10	- - -
11	- - -	11	NO. DESCRIPTION PAGE
12	Videotape deposition of TROOPER	12	(None)
13	MATTHEW WYSOCKY, taken pursuant to notice, was	13	
14	held at remotely, commencing at 11:15 a.m., on	14	
15	the above date, before Torre Lynn Adams, a Court	15	
16	Reporter and Notary Public in the Commonwealth	16	
17	of Pennsylvania.	17	
18	- - -	18	
19		19	
20	ESQUIRE DEPOSITION SOLUTIONS	20	
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Page 2		Page 4	
1	APPEARANCES:	1	- - -
2		2	DEPOSITION SUPPORT INDEX
3	LEVIN & ZEIGER	3	- - -
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11	Representing the Plaintiffs	11	Page Line Page Line Page Line
12		12	None
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19	Representing the Defendants	19	
20		20	Question Marked
21		21	Page Line Page Line Page Line
22		22	None
23		23	
24		24	

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<p style="text-align: right;">Page 5</p> <p>1 - - -</p> <p>2 VIDEO TECHNICIAN: Good morning,</p> <p>3 everyone. We are now on the video record. The</p> <p>4 time is 11:15 a.m. on October 1st, 2020. This</p> <p>5 begins the videotape deposition of Trooper</p> <p>6 Wysocky, correct?</p> <p>7 THE WITNESS: Yes, ma'am.</p> <p>8 VIDEO TECHNICIAN: Okay. Great.</p> <p>9 And we're -- this is taken in the</p> <p>10 matter of Ada Anglemeyer, et al. versus</p> <p>11 Northampton County filed in the U.S. District</p> <p>12 Court for the Eastern District of Pennsylvania,</p> <p>13 Case Number of which is 19-3714.</p> <p>14 My name is Summer Menkee. I'm the</p> <p>15 videographer. We have Torre Lynn Adams as our</p> <p>16 court reporter. And we are both representing</p> <p>17 the Esquire Deposition Solutions.</p> <p>18 And just a courtesy, will everyone</p> <p>19 re -- remember to please mute yourself when</p> <p>20 you're not speaking and remember to unmute when</p> <p>21 you're ready to speak.</p> <p>22 And, Counsel, will you please</p> <p>23 state your name and whom you represent, after</p> <p>24 which the court reporter will swear in the</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. Your name is Wysocky; is that</p> <p>2 right?</p> <p>3 A. That's correct, yes.</p> <p>4 Q. Make sure I'm pronouncing it</p> <p>5 right.</p> <p>6 Okay. So, do you remember the</p> <p>7 date of February 23, 2018?</p> <p>8 A. I do vaguely, yes.</p> <p>9 Q. Okay. Were you employed as a</p> <p>10 Pennsylvania State Trooper at that time?</p> <p>11 A. Yes. Yes, I was.</p> <p>12 Q. And at approximately 4:00 a.m.,</p> <p>13 did your tour of duty take you to some kind of</p> <p>14 meeting about something with the CERT team?</p> <p>15 A. Yes, it did. Yes. It would be --</p> <p>16 it would have been a warrant service on that</p> <p>17 day.</p> <p>18 Q. Okay. And was the warrant service</p> <p>19 eventually conducted at 340 Old Allentown Road,</p> <p>20 Bushkill Township, Northampton County?</p> <p>21 A. Yes, it was.</p> <p>22 Q. And at 4:00 a.m., were you briefed</p> <p>23 on that?</p> <p>24 A. Yes. Yes, we attended a</p>
<p style="text-align: right;">Page 6</p> <p>1 witness.</p> <p>2 MR. ZEIGER: Brian Zeiger for the</p> <p>3 plaintiffs.</p> <p>4 MR. BRADFORD: Kevin Bradford for</p> <p>5 all the current defendants.</p> <p>6 MR. WYSOCKY: Matthew Wysocky for</p> <p>7 the Pennsylvania State Police CERT team.</p> <p>8 MR. ZEIGER: Okay. Good</p> <p>9 afternoon --</p> <p>10 COURT REPORTER: I didn't swear</p> <p>11 him yet. Sorry, sir.</p> <p>12 MR. ZEIGER: Sorry.</p> <p>13 COURT REPORTER: That's okay.</p> <p>14 - - -</p> <p>15 TROOPER MATTHEW WYSOCKY, after</p> <p>16 having been duly sworn, was examined and</p> <p>17 testified as follows:</p> <p>18 - - -</p> <p>19 EXAMINATION</p> <p>20 - - -</p> <p>21 BY MR. ZEIGER:</p> <p>22 Q. Good morning, Trooper. How are</p> <p>23 you today?</p> <p>24 A. Good. And yourself?</p>	<p style="text-align: right;">Page 8</p> <p>1 pre-deployment briefing.</p> <p>2 Q. Okay. And do you remember being</p> <p>3 part of executing the warrant?</p> <p>4 A. Yes, I do.</p> <p>5 Q. Okay. So, do you think you did</p> <p>6 anything wrong that day in your -- in your tour</p> <p>7 of duty?</p> <p>8 A. Absolutely not.</p> <p>9 Q. Okay. And if there's someone</p> <p>10 who -- who claims that you injured them, do you</p> <p>11 accept responsibility for causing that injury?</p> <p>12 MR. BRADFORD: Objection to form.</p> <p>13 BY MR. ZEIGER:</p> <p>14 Q. You can answer.</p> <p>15 MR. BRADFORD: You can answer.</p> <p>16 I'm sorry, I occasionally will</p> <p>17 object to form, as I just did there, Trooper</p> <p>18 Wysocky, but unless I instruct you not to</p> <p>19 answer, you can go ahead and answer.</p> <p>20 Normally, I follow that saying you</p> <p>21 may answer. So, go ahead and attempt to answer.</p> <p>22 THE WITNESS: I'm sorry. Could</p> <p>23 you repeat the question again?</p> <p>24 BY MR. ZEIGER:</p>

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<p style="text-align: right;">Page 9</p> <p>1 Q. Sure.</p> <p>2 If someone claims that you injured</p> <p>3 them on that day, do you accept responsibility</p> <p>4 for causing that injury?</p> <p>5 MR. BRADFORD: Objection to form.</p> <p>6 Actually, I'm telling him not to</p> <p>7 answer. That's a ridiculous question. We had</p> <p>8 this conversation before.</p> <p>9 MR. ZEIGER: Okay. Let me just</p> <p>10 put on the record that, you know, in any civil</p> <p>11 matter a defendant who's named in the case can</p> <p>12 accept responsibility for what they're accused</p> <p>13 of doing in the lawsuit and make it just about</p> <p>14 the value of the case or claim that the person's</p> <p>15 not really injured or something like that or</p> <p>16 that the case isn't worth much.</p> <p>17 So, in a car accident case, in a</p> <p>18 rear-ender, someone can come in and say, you</p> <p>19 know, I did -- I did rear end that person, I did</p> <p>20 cause that accident. So, all of these questions</p> <p>21 are going towards liability. That's the</p> <p>22 intention of the question.</p> <p>23 And certainly, a defendant can</p> <p>24 accept responsibility for either an injury or --</p>	<p style="text-align: right;">Page 11</p> <p>1 question, but go ahead, Trooper.</p> <p>2 THE WITNESS: I will not claim</p> <p>3 responsibility for injuring anything as in this</p> <p>4 case, I did not act out of the realm of my</p> <p>5 duties. I didn't act intentionally, recklessly,</p> <p>6 negligently.</p> <p>7 BY MR. ZEIGER:</p> <p>8 Q. Okay. But even within the course</p> <p>9 of your scope of duties, if you acted within the</p> <p>10 scope of your employment, if Joe Kluska is</p> <p>11 accusing you of injuring him, do you accept</p> <p>12 responsibility for causing that injury?</p> <p>13 MR. BRADFORD: Same objection.</p> <p>14 You can -- you can --</p> <p>15 THE WITNESS: No. No, I wouldn't</p> <p>16 accept responsibility.</p> <p>17 BY MR. ZEIGER:</p> <p>18 Q. No problem.</p> <p>19 All right. So, I'm going to move</p> <p>20 on.</p> <p>21 Do you remember you filled out</p> <p>22 some paperwork in this case?</p> <p>23 A. I do -- what type of paperwork</p> <p>24 would it be?</p>
<p style="text-align: right;">Page 10</p> <p>1 or causation or something related to -- for</p> <p>2 which they're sued for.</p> <p>3 This is a named defendant in the</p> <p>4 case under 1983 for excessive force and he</p> <p>5 should answer.</p> <p>6 MR. BRADFORD: Well, Brian, you're</p> <p>7 asking him for a legal conclusion. You can</p> <p>8 certainly ask him for what he did and who he did</p> <p>9 it -- who he interacted with, but then you're</p> <p>10 giving him this hypotheticals that he doesn't</p> <p>11 know, that someone was injured and they say it</p> <p>12 happened that day. And if he tells me that he</p> <p>13 did it, do you accept responsibility, that's --</p> <p>14 that's -- that's not a fair question. It's not</p> <p>15 a proper question for purposes of a deposition.</p> <p>16 We're here to get facts.</p> <p>17 MR. ZEIGER: Okay.</p> <p>18 BY MR. ZEIGER:</p> <p>19 Q. One of the named plaintiffs, Jim</p> <p>20 Kluska, claims that you injured his shoulder.</p> <p>21 Do you accept responsibility for that?</p> <p>22 MR. BRADFORD: Same objection.</p> <p>23 You -- you can -- you can attempt</p> <p>24 to answer that. I think it's an improper</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. A callout report.</p> <p>2 A. Yes. Yes, I completed a callout</p> <p>3 report.</p> <p>4 Q. Okay. I'm going to show you the</p> <p>5 callout report now. Just bear with me while I</p> <p>6 try to do this. Okay?</p> <p>7 A. Okay.</p> <p>8 Q. Can you see that on your screen,</p> <p>9 Trooper?</p> <p>10 A. Yes.</p> <p>11 Q. Do you see a sticker on the bottom</p> <p>12 right side of your screen that says Wysocky-1?</p> <p>13 A. Yes, I do.</p> <p>14 Q. Okay. I'm going to scroll up to</p> <p>15 the top. Okay?</p> <p>16 A. Okay.</p> <p>17 Q. Can you tell me what this document</p> <p>18 is, if you know?</p> <p>19 A. This is a Pennsylvania State</p> <p>20 Police Special Emergency Response Team callout</p> <p>21 report that we complete at the end of each</p> <p>22 warrant service or any activation that we -- we</p> <p>23 go to.</p> <p>24 Q. Okay. And is this yours from the</p>

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<p style="text-align: right;">Page 13</p> <p>1 incident report we're here today to talk about?</p> <p>2 A. Yes, it is.</p> <p>3 Q. Okay. I'm going to start at the</p> <p>4 top and sort of make my way down. Okay?</p> <p>5 A. Sure.</p> <p>6 Q. If at any time you need me to</p> <p>7 enlarge anything or stop, just interrupt me and</p> <p>8 I'm happy to do that. Okay?</p> <p>9 A. Yes, sir.</p> <p>10 Q. So, it says here date of</p> <p>11 activation is 2-23-18. That means that that's</p> <p>12 the date that you were alerted that you were</p> <p>13 going to be on a CERT team job; is that right?</p> <p>14 A. That's correct, sir.</p> <p>15 Q. And 2-28-18, that means that's the</p> <p>16 date of the actual report -- I'm sorry. Let's</p> <p>17 back up.</p> <p>18 Date of activation of 2-23-18 is</p> <p>19 the day that you guys executed the warrant,</p> <p>20 correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Okay. And 2-28-18 is the day that</p> <p>23 you sat down and actually typed this document,</p> <p>24 correct?</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. And that includes a garage and a</p> <p>2 house, correct?</p> <p>3 A. Yes, I would assume so. I was not</p> <p>4 assigned to those specific buildings, but from</p> <p>5 my recollection, yes, it did include that.</p> <p>6 Q. Where were you assigned?</p> <p>7 A. I was assigned to the main</p> <p>8 structure.</p> <p>9 Q. Okay. And now, it says Date and</p> <p>10 Time of Notification, 2-21-18, 1945. That means</p> <p>11 that's when you were told you were going to have</p> <p>12 a job on the CERT team, right?</p> <p>13 A. Yes.</p> <p>14 Q. And then when it says date and</p> <p>15 time of arrival, it says Date of Arrival, it</p> <p>16 says 2-23-18, 400 hours, that means you were</p> <p>17 briefed for what was going to happen for the</p> <p>18 warrant job at 4:00 in the morning on</p> <p>19 February 23, 2018, right?</p> <p>20 A. Yes, sir.</p> <p>21 Q. And then it says overtime hours</p> <p>22 used 6.5. That means that you did this as all</p> <p>23 overtime, right?</p> <p>24 A. I would not say it was all</p>
<p style="text-align: right;">Page 14</p> <p>1 A. That's correct, sir.</p> <p>2 Q. Okay. And then under name it says</p> <p>3 Trooper Matthew Wysocky, that's you, right?</p> <p>4 A. Yes, it is.</p> <p>5 Q. And then it says Warrant Service.</p> <p>6 That means that you're going to go and execute a</p> <p>7 warrant somewhere. Right?</p> <p>8 A. That's correct. Yes, sir.</p> <p>9 Q. And then it says 340 Old Allentown</p> <p>10 Road, Bushkill Township, Northampton County,</p> <p>11 Pennsylvania. Doesn't say Pennsylvania, but</p> <p>12 that means that's the place where the warrant</p> <p>13 was to be executed, correct?</p> <p>14 A. That's correct, sir.</p> <p>15 Q. And that's a large parcel of land,</p> <p>16 it's not just a -- one individual building,</p> <p>17 right?</p> <p>18 A. According to the brief, yes,</p> <p>19 that's correct, it was a large parcel with</p> <p>20 multiple structures.</p> <p>21 Q. And when you got there, was that</p> <p>22 briefing true, it was a large parcel of land</p> <p>23 with multiple structures?</p> <p>24 A. Yes, it was.</p>	<p style="text-align: right;">Page 16</p> <p>1 overtime. I -- I may have been working a -- I</p> <p>2 may have been working normal -- yes, yes. I was</p> <p>3 not working that day, I would assume. I assume</p> <p>4 that would be correct, yes.</p> <p>5 Q. Right, because next to it on the</p> <p>6 left, it says straight time hours used, zero.</p> <p>7 A. Yes, sir.</p> <p>8 Q. So, that means you were not on</p> <p>9 duty that day, right?</p> <p>10 A. Correct.</p> <p>11 Q. So -- so, overtime hours used,</p> <p>12 6.5, that means you got paid in addition to your</p> <p>13 normal salary for executing this warrant,</p> <p>14 correct?</p> <p>15 A. That's correct, yes.</p> <p>16 Q. Okay. I'm going to go down a</p> <p>17 little bit here. I'm going to scroll a little</p> <p>18 bit so I can see it a little better.</p> <p>19 "For this particular activation, I</p> <p>20 did not notify a shift supervisor as a result of</p> <p>21 this warrant service occurring during my</p> <p>22 regularly scheduled days off."</p> <p>23 So, that's the same thing you just</p> <p>24 testified to up top.</p>

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<p style="text-align: right;">Page 17</p> <p>1 "And there were no notifications 2 made to my schedule." 3 So, you agree with both of those 4 statements, correct? 5 A. Yes, sir. 6 Q. "On the above date and time, I 7 attended the pre-deployment briefing for this 8 warrant service at PSP Belfast." 9 So, that means at 4:00 a.m. you 10 were in a room with some kind of supervisor and 11 they -- they discussed this matter and told you 12 what was going to happen that day, right? 13 A. Yes, sir. 14 Q. And next sentence says "I was 15 assigned to east utility van with Corporal John 16 Chulock as the team leader." 17 What does that mean? 18 A. That means that that's the vehicle 19 that I was specifically assigned to for this 20 activation, went with a team of guys, and John 21 Chulock would have been the corporal in charge 22 of that van or -- in this particular instance, 23 he would have been in charge of that particular 24 van. So, he would have been front seat</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Yes, sir. 2 Q. And the next line says "I was 3 armed with my Glock 21 pistol, a Halligan bar 4 and a 16-pound sledgehammer." 5 Is that right? 6 A. Yes, sir. 7 Q. Okay. So, the Glock pistol, 8 that's just your -- your service weapon, right? 9 A. Yes, sir, my issued -- yes, my 10 issued standard. 11 Q. And Halligan bar, what's that? 12 A. Halligan bar is a -- it's an iron 13 tool used to -- to assist with forcible entry if 14 needed. If there would be a -- sort of a locked 15 door or something along the lines of that, we 16 would use that to assist with opening the door. 17 Q. Is that what non-police officers 18 call a crowbar? 19 A. It's a form of a crowbar, yes. 20 Q. About how long is it? 21 A. 30 inches. 22 Q. About how much does it way weigh? 23 A. Seven pounds, five pounds. 24 Q. Okay. And next says "And a</p>
<p style="text-align: right;">Page 18</p> <p>1 passenger ultimately. 2 Q. "Additionally, I was assigned the 3 duties of assistant breacher and one side 4 clearing." What does that mean? 5 A. That was my duties. So, that was 6 my specific assignment. I was assigned to the 7 van for -- I was assigned to the van, and then 8 more specifically, I was assigned as an 9 assistant breacher, that would have been to 10 assist the primary breacher, which in this case 11 would have been Trooper Peter Del Gaizo. And 12 then upon breach, we would assist with -- with 13 clearing of the residence. 14 Q. So, some other -- something called 15 a ram? Are you familiar with that tool? 16 A. Yes, sir. 17 Q. Did you have a ram that day? 18 A. I did not. I had a -- I had other 19 tools. 20 Q. Okay. So, the next sentence says 21 "Trooper Peter Del Gaizo was the primary 22 breacher." 23 That's consistent with what you 24 already testified to, correct?</p>	<p style="text-align: right;">Page 20</p> <p>1 16-pound sledgehammer." 2 So, that's just a sledgehammer 3 that -- that any non-police officer would just 4 call a sledgehammer, it's the same item? 5 A. Fair to say, yes. 6 Q. Okay. "And after the briefing, 7 several rehearsals were conducted in the parking 8 lot of PSP Belfast." 9 Can you explain what that means? 10 A. Prior to deployment, what we do 11 with that, with warrant services we run dry runs 12 and rehearsals to make sure that -- that -- that 13 everyone is where they need to be, and to make 14 sure we have down our routine that could 15 possibly occur upon execution of the warrant 16 service. 17 Q. Okay. What did you, personally, 18 rehearse? 19 A. I, personally, rehearsed assisting 20 Trooper Peter Del Gaizo in opening the door, a 21 couple different scenarios simulating that 22 there's a storm door, simulating that it's 23 locked, simulating that the door is open, 24 running through multiple scenarios.</p>

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<p style="text-align: right;">Page 21</p> <p>1 Q. Okay. And did you see someone 2 there named Painter? 3 A. I believe -- I believe he was 4 there, yes. 5 Q. So, you know someone named 6 Painter? 7 A. I do -- his first name, could you 8 say his first name from me? 9 Q. If only I could remember his first 10 name, I would say it to you. 11 MR. BRADFORD: Clinton. 12 THE WITNESS: Clinton Painter? 13 MR. ZEIGER: Thank you. 14 BY MR. ZEIGER: 15 Q. Is he a Trooper? 16 A. He is a trooper -- he's either a 17 trooper or a corporal of the State Police, I'm 18 not sure. 19 Q. He worked as a law enforcement 20 officer for the Pennsylvania State Police, 21 correct? 22 A. That's correct, yes. 23 Q. So, did you see him rehearse 24 anything in the parking lot?</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. "I opened the front storm door and 2 determined that the one side main door was 3 locked and secured." 4 So, you were holding open the 5 storm door at that point? 6 A. Yes. 7 Q. Okay. "At that time, Trooper Del 8 Gaizo and I utilized the ram tool and impacted 9 the one side main door in the area of the knob 10 and dead bolt locking mechanism, which resulted 11 in a successful breach." 12 So, that means that Del Gaizo had 13 the -- the ram or you both had the ram? 14 A. We would both have the ram at that 15 time. We would use the two-man breaching method 16 to impact the door. 17 Q. And then so, that means that you 18 take this ram, you sort of swing it backwards 19 and then the two of you push it forward with all 20 your might, and the physics of that move is 21 supposed to pop the door open? 22 A. Yes, that's correct. 23 Q. Okay. If Del Gaizo said that he 24 did it himself and you were holding the door for</p>
<p style="text-align: right;">Page 22</p> <p>1 A. I did not. 2 Q. Okay. Was he there? 3 A. He was there, yes. 4 Q. Do you remember what his job 5 assignment was that day? 6 A. I do not. 7 Q. Do you remember seeing him in the 8 house? 9 A. No, I do not. 10 Q. Do you remember seeing him push an 11 old lady into a wall with a shield? 12 A. No. 13 Q. Did you ever see an ambulance come 14 to the location of the house? 15 A. No, I don't recall an ambulance 16 showing up to the house. 17 Q. Okay. I'm going to move on to the 18 document on your screen. 19 "Upon arriving at the subject 20 residence, the team deployed from the vehicles 21 and advanced to the front porch of the 22 structure." 23 Is that all correct? 24 A. Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 him, that would be a mistake? 2 I mean, the screen door? 3 A. The screen door? I might have 4 handed the scene door off to him depending on 5 how it opened. If it would have opened a 6 specific way, he would have stepped into the 7 screen door and I would have left the screen 8 door go. I can't recall whether the screen door 9 would have exactly opened. 10 Q. I'm going to ask a different group 11 of questions then. Okay? 12 So, Del Gaizo testified earlier 13 this morning that when you got to the scene, 14 that you opened the screen door and held it 15 open. 16 Do you remember if that's true? 17 A. I cannot recall. 18 Q. And then Del Gaizo testified that 19 while you were holding screen door open, that he 20 used the ram alone and breached the door alone 21 by himself? 22 MR. BRADFORD: Objection to form. 23 You can answer. 24 BY MR. ZEIGER:</p>

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<p style="text-align: right;">Page 25</p> <p>1 Q. Is that what happened?</p> <p>2 A. I -- I would say that I probably</p> <p>3 assisted him with the ram tool in breaching the</p> <p>4 door.</p> <p>5 Q. Okay. So -- so, he's mistaken</p> <p>6 probably?</p> <p>7 MR. BRADFORD: Objection to form.</p> <p>8 THE WITNESS: I could -- I</p> <p>9 couldn't say -- say if -- if he would have been</p> <p>10 or not. I'm not sure that he -- if you're</p> <p>11 telling me he testified to that, then I would</p> <p>12 say that -- that I -- I did assist him with</p> <p>13 breaching the door.</p> <p>14 MR. BRADFORD: You did or did not?</p> <p>15 THE WITNESS: I did.</p> <p>16 MR. BRADFORD: Okay. Trooper,</p> <p>17 your main memory controls here. So, he's going</p> <p>18 to try to -- you know, he's giving you</p> <p>19 information maybe to help revive your memory</p> <p>20 further, but if that doesn't do it, your memory</p> <p>21 controls. Just answer the question based on</p> <p>22 your knowledge. You don't have to agree with</p> <p>23 something that you don't agree with.</p> <p>24 BY MR. ZEIGER:</p>	<p style="text-align: right;">Page 27</p> <p>1 warrant."</p> <p>2 Is that true?</p> <p>3 A. Yes.</p> <p>4 Q. And do you know in the order of</p> <p>5 troopers, do you know where you were to get into</p> <p>6 the property, beginning, middle, end? Do you</p> <p>7 have an estimate?</p> <p>8 A. I would have been in the</p> <p>9 beginning.</p> <p>10 Q. Okay. So, one of the first ones</p> <p>11 in?</p> <p>12 A. Yes.</p> <p>13 Q. Where was the ram when you went</p> <p>14 in?</p> <p>15 A. I don't recall.</p> <p>16 Q. Where was the Halligan bar?</p> <p>17 A. I don't recall that either.</p> <p>18 Q. Where was the sledgehammer?</p> <p>19 A. I don't recall.</p> <p>20 Q. And -- okay. "And I proceeded</p> <p>21 into a bedroom located in the one/four corner of</p> <p>22 the first floor and addressed a male located in</p> <p>23 the bed."</p> <p>24 What is one/four mean?</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. And let me give you an instruction</p> <p>2 as well, because I don't do the instructions at</p> <p>3 the beginning of my depositions, because I think</p> <p>4 it's a waste of everyone's time. I'm going to</p> <p>5 do that now.</p> <p>6 I agree completely with your</p> <p>7 lawyer. If you don't recall, you shouldn't</p> <p>8 guess. If I ask you to estimate and you can't</p> <p>9 estimate, you should say I can't estimate.</p> <p>10 We're here today to discover what</p> <p>11 happened. Your lawyer and I were not there. We</p> <p>12 don't know what actually happened. There are no</p> <p>13 trick questions.</p> <p>14 A. Right.</p> <p>15 Q. I am simply here for the purpose</p> <p>16 of getting something down on the record for you</p> <p>17 to be able to explain your version of what</p> <p>18 happened so I can discover what really occurred.</p> <p>19 Do you understand that?</p> <p>20 A. Yes. Yes, sir.</p> <p>21 Q. Okay. Very good.</p> <p>22 All right. Moving on.</p> <p>23 "Once inside the residence, I</p> <p>24 began repeatedly announcing State Police search</p>	<p style="text-align: right;">Page 28</p> <p>1 A. That's the location of the</p> <p>2 residence where that bedroom would have been</p> <p>3 located. So, looking at the house, if -- if the</p> <p>4 walls were numbered starting with the front wall</p> <p>5 as one, going in clockwise motion two, three,</p> <p>6 four, that bedroom would have been in that front</p> <p>7 one/four corner of the residence.</p> <p>8 Q. And first floor -- how many floors</p> <p>9 were there?</p> <p>10 A. Two.</p> <p>11 Q. And is the first floor the top</p> <p>12 floor or the bottom floor?</p> <p>13 A. It's the main floor.</p> <p>14 Q. Okay. Is the other floor above it</p> <p>15 or below it?</p> <p>16 A. Second floor would be above it.</p> <p>17 MR. BRADFORD: Okay. Can I jump</p> <p>18 in here real quick? Are you sure you weren't on</p> <p>19 the upper floor?</p> <p>20 THE WITNESS: I don't recall. We</p> <p>21 went in the front door and that's the floor that</p> <p>22 that bedroom was on.</p> <p>23 MR. BRADFORD: Okay.</p> <p>24 BY MR. ZEIGER:</p>

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<p style="text-align: right;">Page 29</p> <p>1 Q. All right. So, you don't recall 2 whether the first floor is the upper or lower 3 floor, I guess, is your answer, right? 4 A. Correct. 5 Q. Okay. "And addressed a male 6 located in the bed." 7 What does that mean? 8 A. It means as soon as I entered the 9 bedroom, the male was in the bed and then I went 10 to his location. 11 Q. Anyone else in the room? 12 A. It was the female also in the bed 13 and Trooper Del Gaizo. 14 Q. And the two people that were in 15 the bed, what were they wearing? 16 A. I don't recall. 17 Q. Were they under the covers or over 18 the covers? 19 A. Under the covers. 20 Q. Were they asleep? 21 A. I don't recall. 22 Q. Did they appear to be asleep? 23 A. Yes. 24 Q. And what did you see Del Gaizo do</p>	<p style="text-align: right;">Page 31</p> <p>1 What, if any, interaction did you 2 have with that male while you were addressing 3 him? 4 A. Minimal. I went to his location 5 in the bed. We -- we secured him as quickly as 6 we could and then we located him to the floor 7 area. 8 Q. I -- if you're going to say "we," 9 I'd like to know exactly what you did and 10 exactly what Del Gaizo did. So, can you repeat 11 your answer, but please don't say "we"? I 12 struggle with pronounce greatly. 13 A. Yeah, sure. 14 I approached the male. I 15 attempted to get his arms from him from 16 underneath the covers, so I could visualize his 17 arms. And I assist -- I put his arms behind his 18 back at that time so I could assist with 19 applying flex cuffs to him before I -- 20 Q. Please finish. I'm sorry. I 21 apologize. 22 A. That was all on the bed before I 23 located him to the floor. 24 Q. So, he was flex cuffed before he</p>
<p style="text-align: right;">Page 30</p> <p>1 when you entered the room? 2 A. Del Gaizo addressed the female in 3 the same manner that I addressed the male. 4 Q. I know I may have asked you this 5 three questions ago, but the word addressed is 6 boggling to me. I'm having a hard time with 7 that. 8 Can you tell me what the word 9 addressed means? 10 A. He approached her and he went to 11 her location. He rendered the necessary means 12 of securing her and rendering the occupants of 13 the room and the room safe. I think that's all 14 addressed. 15 Q. How did he secure her? 16 A. I can't recall. 17 Q. And you addressed the male. Did 18 you secure him? 19 A. Yes, sir. 20 Q. Okay. What, if any, interaction 21 did you have with him before you -- you -- you 22 put -- I'm going to withdraw that and I'm going 23 to rephrase that. I can't I'll never get the 24 words out.</p>	<p style="text-align: right;">Page 32</p> <p>1 was put to the floor? 2 A. Yes. 3 Q. Okay. I think I understand now. 4 And where -- where is Del Gaizo 5 while you're putting the flex cuffs on him while 6 he's still in bed? 7 A. Del Gaizo with me. He's in the -- 8 in the vicinity of me as well. 9 Q. Okay. So, that male must have 10 been on his stomach, right? 11 A. Yes, at one point. 12 Q. Well, I mean, at the part -- at 13 the time you flex cuffed him in the bed, he 14 would have had to be on his stomach, correct? 15 A. Correct. 16 Q. Okay. So, when you came in the 17 room, was he on his stomach or did you flip him 18 over onto his stomach? 19 A. I don't recall. 20 Q. All right. Let's move on here 21 with the document. 22 "The male was secured and Trooper 23 Del Gaizo assisted with applying flex cuffs." 24 Is that true?</p>

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<p style="text-align: right;">Page 33</p> <p>1 A. Yes.</p> <p>2 Q. "The male was then moved to the</p> <p>3 floor where he was patted down for officer</p> <p>4 safety."</p> <p>5 Is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. Did you find anything on him?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you see a gun in the</p> <p>10 room anywhere?</p> <p>11 A. Yes.</p> <p>12 Q. Where was the gun?</p> <p>13 A. The gun was located on the</p> <p>14 headboard of the bed.</p> <p>15 Q. Did you see him go for the gun at</p> <p>16 all at any point in time?</p> <p>17 A. No.</p> <p>18 Q. He wasn't arrested for anything</p> <p>19 related to that gun, was he?</p> <p>20 A. I couldn't say.</p> <p>21 Q. Why not?</p> <p>22 A. Because it's not on us to -- to</p> <p>23 say whether or not they're charged with any sort</p> <p>24 of crimes or if they are or not, in fact,</p>	<p style="text-align: right;">Page 35</p> <p>1 A. No, not in particularly.</p> <p>2 Q. You understand that if you have</p> <p>3 someone cuffed in some way, whether it's flex</p> <p>4 cuffs or handcuffs, and you lift them up by the</p> <p>5 back of their wrist and move their wrist towards</p> <p>6 like the 12:00 upward motion, that someone could</p> <p>7 become severely injured, right?</p> <p>8 A. Yes.</p> <p>9 Q. So, if you did that, that would</p> <p>10 violate some policy of the Pennsylvania State</p> <p>11 Police, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And in this case, your</p> <p>14 claim is you did not do that to that male,</p> <p>15 right?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And you didn't see Del</p> <p>18 Gaizo do that, did you?</p> <p>19 A. No, I did not.</p> <p>20 Q. "The male was then assisted off</p> <p>21 the floor and placed on a chair."</p> <p>22 Where was the chair from?</p> <p>23 A. The chair was from the bedroom.</p> <p>24 Q. Okay. And who placed them on the</p>
<p style="text-align: right;">Page 34</p> <p>1 charged with crimes. It's just our job to go in</p> <p>2 and secure the residence and the occupants at</p> <p>3 that time.</p> <p>4 Q. Are you aware -- did you have the</p> <p>5 male charged with anything else?</p> <p>6 A. I couldn't say.</p> <p>7 Q. That's fair. Okay.</p> <p>8 And the male was then moved to the</p> <p>9 floor where he was patted down for officer</p> <p>10 safety. I know I repeated that already.</p> <p>11 How was he moved from the bed to</p> <p>12 the floor?</p> <p>13 A. We would have just carried him</p> <p>14 from the bed right onto the form.</p> <p>15 Q. What part of your body touched</p> <p>16 what part of his body?</p> <p>17 A. My hands would have been around</p> <p>18 his arms.</p> <p>19 Q. Okay. You didn't like lift up his</p> <p>20 wrist by where the flex cuffs were in order to</p> <p>21 get him off out of the bed, did you?</p> <p>22 A. No.</p> <p>23 Q. Because you're trained not to do</p> <p>24 that, right?</p>	<p style="text-align: right;">Page 36</p> <p>1 chair?</p> <p>2 A. I did.</p> <p>3 Q. Without Del Gaizo?</p> <p>4 A. I can't recall.</p> <p>5 Q. And how did you get him into the</p> <p>6 chair?</p> <p>7 A. We rolled him onto his side and</p> <p>8 assisted him up.</p> <p>9 Q. Because he was on his stomach</p> <p>10 before that?</p> <p>11 A. Yes.</p> <p>12 Q. So, went from being on his stomach</p> <p>13 to -- on the bed to his stomach on the ground?</p> <p>14 A. Yes.</p> <p>15 Q. And then you lift -- and then --</p> <p>16 and then you rolled him to the side and then</p> <p>17 helped him up to get into the chair?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Then it says "I remained with the</p> <p>20 male until released by investigators."</p> <p>21 What does that mean?</p> <p>22 A. That means that I would have</p> <p>23 remain -- I did remain in the room until the</p> <p>24 investigating officers or -- or people assisting</p>

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<p style="text-align: right;">Page 37</p> <p>1 with the investigation came and took custody of</p> <p>2 the -- of the individuals in the room.</p> <p>3 Q. "In this room, there was the</p> <p>4 pistol located on the headboard of the bed."</p> <p>5 That's consistent with your</p> <p>6 previous testimony, correct?</p> <p>7 A. Yes.</p> <p>8 Q. "The residents and all occupants</p> <p>9 encountered by other team members were</p> <p>10 subsequently released into the custody of the</p> <p>11 investigators."</p> <p>12 That's consistent with your</p> <p>13 previous testimony, correct?</p> <p>14 A. Yes, correct.</p> <p>15 Q. "I attended the after action</p> <p>16 debriefing at PSB Belfast."</p> <p>17 Can you explain what that means?</p> <p>18 A. After each activation, we -- we</p> <p>19 conduct a debrief. It's to speak about the</p> <p>20 outcome of the execution of the warrant service</p> <p>21 on our end.</p> <p>22 Q. Okay. I'm going to scroll down</p> <p>23 "The team was dismissed at approximately</p> <p>24 0730 hours."</p>	<p style="text-align: right;">Page 39</p> <p>1 Can you rectify that in any way?</p> <p>2 MR. BRADFORD: Objection to form.</p> <p>3 THE WITNESS: No, I'm not.</p> <p>4 BY MR. ZEIGER:</p> <p>5 Q. So, your statement that you wrote</p> <p>6 here in Wysocky-1 that we just went over on your</p> <p>7 screen, you maintain that's what happened when</p> <p>8 you went into the room?</p> <p>9 A. Yes, sir.</p> <p>10 Q. There's no mistakes at all in</p> <p>11 this?</p> <p>12 A. No, sir.</p> <p>13 Q. There's no omissions from it?</p> <p>14 A. No, sir.</p> <p>15 MR. BRADFORD: Object to form.</p> <p>16 BY MR. ZEIGER:</p> <p>17 Q. So, if Del Gaizo had a different</p> <p>18 set of facts as far as who touched the male,</p> <p>19 he's wrong?</p> <p>20 MR. BRADFORD: Objection to form.</p> <p>21 THE WITNESS: I couldn't say, sir.</p> <p>22 BY MR. ZEIGER:</p> <p>23 Q. Well, either you're wrong or he's</p> <p>24 wrong.</p>
<p style="text-align: right;">Page 38</p> <p>1 That means at 7:30 in the morning</p> <p>2 the job was over?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay. So, did you ever come to</p> <p>5 learn what the woman's name was in the room?</p> <p>6 A. No, I didn't.</p> <p>7 Q. If I told you her name was Renee,</p> <p>8 would that refresh your recollection?</p> <p>9 A. It could be.</p> <p>10 Q. Why do you say that?</p> <p>11 A. I do recall the intelligence brief</p> <p>12 that there was a female by the name of Renee.</p> <p>13 Q. Okay. And if I told you that the</p> <p>14 gentleman's name -- well, do you know the</p> <p>15 gentleman's name in the room?</p> <p>16 A. I don't, no.</p> <p>17 Q. If I told you his name was Joseph</p> <p>18 or Joe, would that refresh your recollection?</p> <p>19 A. No.</p> <p>20 Q. Okay. So, previously, Del Gaizo</p> <p>21 testified that he only touched the woman in the</p> <p>22 room and he did not touch the male in the room.</p> <p>23 And here, in your statement, you say that you</p> <p>24 and Del Gaizo both touched the male.</p>	<p style="text-align: right;">Page 40</p> <p>1 MR. BRADFORD: Trooper, are you</p> <p>2 sure that Del Gaizo touched the male?</p> <p>3 THE WITNESS: I couldn't say.</p> <p>4 BY MR. ZEIGER:</p> <p>5 Q. So, now you're not sure?</p> <p>6 A. I know for sure that I -- that I</p> <p>7 touched the male.</p> <p>8 Q. All right. I'm going to go back</p> <p>9 to this document again. I just want to -- I</p> <p>10 want to get everything on the record and give</p> <p>11 you a full and fair opportunity to speak about</p> <p>12 what happened.</p> <p>13 I'm not the most technologically</p> <p>14 savvy guy, but I'm going to try and use some</p> <p>15 technology here.</p> <p>16 You see that underline I just put</p> <p>17 on there?</p> <p>18 A. Yes, sir.</p> <p>19 Q. It says "The male was secured by</p> <p>20 Trooper Del Gaizo assisted with applying flex</p> <p>21 cuffs."</p> <p>22 That's what it says, right?</p> <p>23 A. Yes.</p> <p>24 Q. And this is your statement, right?</p>

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<p style="text-align: right;">Page 41</p> <p>1 A. Yes, it is.</p> <p>2 Q. Okay. So, did -- did Del Gaizo</p> <p>3 help you in applying the flex cuffs to the male,</p> <p>4 yes or no?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So, before when your lawyer</p> <p>7 asked a question in the middle of this and you</p> <p>8 said you weren't sure, you are sure now that Del</p> <p>9 Gaizo did help you apply the flex cuffs, right?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And so, if Del Gaizo said</p> <p>12 that he never touched the male before, your</p> <p>13 testimony today is that Del Gaizo's mistaken; is</p> <p>14 that correct?</p> <p>15 MR. BRADFORD: Objection to form.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MR. ZEIGER:</p> <p>18 Q. That's a yes?</p> <p>19 A. Yes.</p> <p>20 Q. All right. I'm going to go to a</p> <p>21 different document.</p> <p>22 Can you see that on your screen?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And you see that sticker, says</p>	<p style="text-align: right;">Page 43</p> <p>1 are important here.</p> <p>2 BY MR. ZEIGER:</p> <p>3 Q. I agree with your lawyer.</p> <p>4 Is that right?</p> <p>5 A. Yes.</p> <p>6 Q. All right. Now, when you did</p> <p>7 these, did you answer all these or did you just</p> <p>8 give the -- or did your lawyer do it for you?</p> <p>9 A. I answered them.</p> <p>10 Q. Okay. And then your lawyer typed</p> <p>11 them up?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And by the way, before we</p> <p>14 get into this, on that previous document that I</p> <p>15 showed you, Wysocky-1, are there any other</p> <p>16 mistakes on that document other -- other than</p> <p>17 that -- that one thing I -- I highlighted?</p> <p>18 A. No.</p> <p>19 Q. Are there any omissions, anything</p> <p>20 you left out in there that you wish you had put</p> <p>21 in?</p> <p>22 A. No.</p> <p>23 Q. Okay. I'm going back up to the</p> <p>24 top here on this one, just bear with me for a</p>
<p style="text-align: right;">Page 42</p> <p>1 "Plaintiff's Exhibit Wysocky-2"?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. I'm going to scroll up</p> <p>4 here.</p> <p>5 It says Defendant's Response to</p> <p>6 Plaintiff's Interrogatories. Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. All right. I'm going to go all</p> <p>9 the way to the end.</p> <p>10 Second to last page, it says</p> <p>11 "Verification."</p> <p>12 Do you see that?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And that's your signature in your</p> <p>15 own handwriting on that document, right?</p> <p>16 A. Yes, it is.</p> <p>17 Q. Okay. And this means that you</p> <p>18 verified that the answers and responses that</p> <p>19 were contained in this document were true and</p> <p>20 accurate to the best of your ability; is that</p> <p>21 right?</p> <p>22 MR. BRADFORD: The facts -- the</p> <p>23 factual information.</p> <p>24 MR. ZEIGER: Right, the facts that</p>	<p style="text-align: right;">Page 44</p> <p>1 minute.</p> <p>2 I'm going to go to Number 6. Do</p> <p>3 you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Do you want me to blow it up?</p> <p>6 A. Could you, please?</p> <p>7 Q. Yeah, absolutely.</p> <p>8 Did that blow it up?</p> <p>9 A. No -- that's -- I don't know if</p> <p>10 that's -- oh, there we go. Thank you.</p> <p>11 Q. You're welcome.</p> <p>12 Okay. Do you see Number 6?</p> <p>13 A. Yes.</p> <p>14 Q. I've got to enlarge my screen to</p> <p>15 be able to read it now. Okay.</p> <p>16 Can you still see it?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Okay. I'm going to read this</p> <p>19 aloud.</p> <p>20 "As explained in his callout</p> <p>21 report, responding party located a white male</p> <p>22 and white female he found together in the front</p> <p>23 bedroom on the upper floor of the house and that</p> <p>24 he was involved in securing both individuals.</p>

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<p style="text-align: right;">Page 45</p> <p>1 The woman was too young to be to female 2 plaintiff. Responding party is currently 3 without knowledge or information sufficient to 4 form a belief as to whether the male is one of 5 the plaintiffs given the limited description of 6 the plaintiffs provided in the Complaint. 7 "Upon information and belief, this 8 individual did not have any injuries or require 9 any medical treatment. All individuals were to 10 be secured as part of the process of securing 11 the premises pursuant to the warrant, which is 12 what happened." 13 Do you remember giving that answer 14 to your lawyer? 15 A. Yes. 16 Q. Okay. I'm going to make a 17 statement now. The male in the bed was a 18 gentleman named Joe Kluska or Joseph Kluska. 19 He's one of the named plaintiffs in this case 20 and he is accusing you of injuring his 21 shoulders, both of them. Okay? 22 MR. BRADFORD: I'm objecting to 23 that. It's a statement, not a question. 24 MR. ZEIGER: Yes, it's a</p>	<p style="text-align: right;">Page 47</p> <p>1 THE WITNESS: I'm sorry. 2 MR. BRADFORD: You can answer. 3 THE WITNESS: I would say it was a 4 possibility that his shoulder may -- may have 5 been injured; however, back to my original 6 statement, it wasn't done intentionally or 7 recklessly or negligently. 8 BY MR. ZEIGER: 9 Q. So, the answer is, you may have 10 injured his shoulder, you're just not sure? 11 A. Right. 12 Q. Okay. 13 A. There was nothing said that day of 14 -- there was no mention of it. 15 Q. I'm just trying to understand, 16 though, did you see anyone else touch that guy 17 that day other than you or Del Gaizo? 18 A. No. 19 Q. Okay. So, if he claims that 20 there's some trooper that injured his shoulder, 21 whether it's -- whether it's actually injured or 22 not, though, there's no other troopers that had 23 any physical contact with him that you're aware 24 of, correct?</p>
<p style="text-align: right;">Page 46</p> <p>1 statement. 2 BY MR. ZEIGER: 3 Q. Okay. The question is, based on 4 that statement, do you have any knowledge about 5 injuring the man's shoulder who you flex cuffed 6 while laying on his stomach in bed that morning? 7 A. No, I don't. 8 Q. Did you get anyone any medical 9 care for any kind of shoulder injury in that 10 room? 11 A. No, I didn't. 12 Q. Did that male ask you for any help 13 or any medical attention regarding his 14 shoulders -- 15 A. No. 16 Q. -- regarding how you flex tied 17 him? 18 A. No, he didn't. 19 Q. Okay. And -- and if he -- he were 20 to say that you did injure his shoulders based 21 on your actions in the room that day, what's 22 your response to that? 23 MR. BRADFORD: Objection. 24 You can answer.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Correct. 2 Q. I'm going to keep going here. 3 Did you have a body cam on? 4 A. No. 5 Q. Do you know why not? 6 A. We don't have body cam -- cameras 7 in the Pennsylvania State Police. 8 Q. Have you ever complained to your 9 supervisor that you want one? 10 A. No. 11 Q. Are you a member of a union? 12 A. Yes. 13 Q. Have you ever filed a grievance 14 with your union that you want a body cam? 15 A. No. 16 Q. Why not? 17 MR. BRADFORD: Objection to form. 18 You can answer. 19 THE WITNESS: Because -- because I 20 don't believe that -- that we need them right 21 now. If they would give us one, then I would 22 wear it, I'd be more than happy to wear it; 23 however, I -- I was never faced with a situation 24 where I would be dishonest or use excessive</p>

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<p style="text-align: right;">Page 49</p> <p>1 force or anything of that nature that I would</p> <p>2 need to -- to cover myself in -- in a case of an</p> <p>3 instance that -- that I would do something</p> <p>4 wrong.</p> <p>5 BY MR. ZEIGER:</p> <p>6 Q. I mean, Trooper, in the most</p> <p>7 respectful way I can possibly frame this next</p> <p>8 question, in this case, you are being accused of</p> <p>9 using excessive force against Joe Kluska. You</p> <p>10 understand that, right?</p> <p>11 A. Yes.</p> <p>12 Q. So, you have been accused of using</p> <p>13 excessive forces before in your line of duty,</p> <p>14 specifically this case that we're here for,</p> <p>15 right? You get that?</p> <p>16 A. Yes.</p> <p>17 Q. So, do you -- let me ask the</p> <p>18 question again about the -- about the body cam.</p> <p>19 So, why have you never requested</p> <p>20 to wear a body cam or file grievance with your</p> <p>21 union to wear a body cam?</p> <p>22 MR. BRADFORD: Objection to form.</p> <p>23 You can answer.</p> <p>24 THE WITNESS: Because we -- we</p>	<p style="text-align: right;">Page 51</p> <p>1 Q. You can answer if you want.</p> <p>2 MR. BRADFORD: No, he's not</p> <p>3 answering that question.</p> <p>4 BY MR. ZEIGER:</p> <p>5 Q. Moving on.</p> <p>6 Okay. In Number 13 here, it says</p> <p>7 "Describe in detail your tactical approach for</p> <p>8 securing the property." It says "Responding</p> <p>9 party's exact role as specified in his callout</p> <p>10 report and the warrant service plan. Document's</p> <p>11 in plaintiff's possession for months. Was set</p> <p>12 by CERT leadership. Upon information and</p> <p>13 belief, the search warrant specifically included</p> <p>14 three structures; the residence, a nearby garage</p> <p>15 and a trailer. Responding party does not recall</p> <p>16 any other structures that were not secured."</p> <p>17 Is that true?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall any information at</p> <p>20 all that in the house that there was any illegal</p> <p>21 activity occurring?</p> <p>22 A. I don't recall.</p> <p>23 Q. Okay. So, do you know that the</p> <p>24 garage is the location where -- where apparently</p>
<p style="text-align: right;">Page 50</p> <p>1 don't have -- I mean, we have -- on -- on the</p> <p>2 road, there's MVRs, there's things -- different</p> <p>3 other recording systems that we have.</p> <p>4 You know, CERT -- CERT is a</p> <p>5 part-time entity for me. It's -- we're not full</p> <p>6 time. On the road -- on the road, we're covered</p> <p>7 by -- by other means of -- of recording systems,</p> <p>8 but as far as MVRs or microphones.</p> <p>9 BY MR. ZEIGER:</p> <p>10 Q. Can you promise me that today</p> <p>11 after this deposition's over, that you're going</p> <p>12 to go to your union and file a grievance, and in</p> <p>13 the grievance, say you want a body cam for the</p> <p>14 future in your job as a Pennsylvania State</p> <p>15 Trooper? Can you give me that promise today?</p> <p>16 MR. BRADFORD: Objection.</p> <p>17 BY MR. ZEIGER:</p> <p>18 Q. Can you --</p> <p>19 MR. BRADFORD: Objection to the</p> <p>20 question.</p> <p>21 Do not answer that.</p> <p>22 This is ridiculous. Come on,</p> <p>23 Brian.</p> <p>24 BY MR. ZEIGER:</p>	<p style="text-align: right;">Page 52</p> <p>1 there was illegal activity occurring?</p> <p>2 A. I don't recall.</p> <p>3 Q. Okay. Moving on.</p> <p>4 Number 14 has to do with whether</p> <p>5 or not any methamphetamine was recovered by the</p> <p>6 CERT team. And your response was "Responding</p> <p>7 party did not discover any suspected</p> <p>8 methamphetamine while securing the party.</p> <p>9 Responding party does not know what each of the</p> <p>10 other CERT members discovered."</p> <p>11 A. That --</p> <p>12 Q. That means you did not recover any</p> <p>13 methamphetamine, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And did you observe anyone commit</p> <p>16 any crime, that if it was your job, you would</p> <p>17 have made an arrest for?</p> <p>18 A. I did not observe anything.</p> <p>19 Q. I'm going to keep going down.</p> <p>20 Next question on that here is</p> <p>21 Number 16, and this is about a firearm's arrest.</p> <p>22 So, you said there was a firearm</p> <p>23 on the headboard, correct?</p> <p>24 A. Yes, sir.</p>

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<p style="text-align: right;">Page 53</p> <p>1 Q. If this was your job and you were</p> <p>2 the -- the trooper making the decision, you</p> <p>3 would not have arrested the male or female in</p> <p>4 the room for anything related to the firearm; is</p> <p>5 that correct?</p> <p>6 A. I couldn't say.</p> <p>7 Q. Why not?</p> <p>8 A. Because I'm unaware of any</p> <p>9 additional investigatory information besides us</p> <p>10 going in to secure the -- the property and the</p> <p>11 occupants.</p> <p>12 Q. Correct.</p> <p>13 So, the answer to my question then</p> <p>14 is no, you didn't have any information or</p> <p>15 observe anything at that time that would lead</p> <p>16 you to make an arrest for anything related to</p> <p>17 that firearm based on what you did that day,</p> <p>18 right?</p> <p>19 A. Correct, correct.</p> <p>20 Q. Okay. I'm going to unshare this</p> <p>21 document and I am going to go to another one.</p> <p>22 Do you see that sticker Wysocky-3?</p> <p>23 A. Yes, sir.</p> <p>24 Q. I'm going to scroll up. This is a</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. And I'm going to just scroll down</p> <p>2 here. The first one is April the 4th of 2012.</p> <p>3 It says "Allegation vehicle code driving vehicle</p> <p>4 at safe speed regulation review."</p> <p>5 Do you remember that matter?</p> <p>6 A. Yes.</p> <p>7 Q. So, you know, it's -- as a</p> <p>8 nonmember of law enforcement, it's a little hard</p> <p>9 for me understand it. It says you were driving</p> <p>10 the vehicle at a safe speed.</p> <p>11 So, that would not seem like what</p> <p>12 that's -- it would seem like that's what we're</p> <p>13 all supposed to do, is drive at a safe speed.</p> <p>14 So, can you explain what that -- what happened?</p> <p>15 A. That was someone on the interstate</p> <p>16 just made a complaint to Harrisburg that my</p> <p>17 vehicle may have been speeding. And by the</p> <p>18 looks at it, I got supervisor resolution, which</p> <p>19 means that my supervisor spoke to me about it</p> <p>20 and went over the regulation with me.</p> <p>21 Q. So, the allegation was that you</p> <p>22 were, in fact, not driving a vehicle at a safe</p> <p>23 speed; is that right?</p> <p>24 A. Yes, it's not driving a vehicle at</p>
<p style="text-align: right;">Page 54</p> <p>1 document titled at the top. It says "Concise</p> <p>2 Officer History, Corporal Matthew Wysocky."</p> <p>3 Is that you, Matthew Wysocky?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And have you ever seen this</p> <p>6 document before, Concise Officer History?</p> <p>7 A. No, sir.</p> <p>8 Could you blow that up a little</p> <p>9 bit for me, please?</p> <p>10 Q. Yes, absolutely.</p> <p>11 A. I'm sorry.</p> <p>12 Q. No. I wish I was a little better</p> <p>13 at the technology.</p> <p>14 Is that better or no?</p> <p>15 A. Yes, that's fine. That's fine.</p> <p>16 Q. Have you ever seen this document</p> <p>17 before?</p> <p>18 A. No, sir.</p> <p>19 Q. I'm going to go through the</p> <p>20 document with you now. It's not that long,</p> <p>21 three pages.</p> <p>22 It said you were hired on May 9th</p> <p>23 of 2011. Do you see that?</p> <p>24 A. Yes, sir.</p>	<p style="text-align: right;">Page 56</p> <p>1 a safe speed, but -- it says it the way it is,</p> <p>2 it's driving the vehicle at safe speed --</p> <p>3 Q. Police officers make words out of</p> <p>4 things that don't make sense sometimes.</p> <p>5 Okay. I'm going to scroll down.</p> <p>6 The next is July 25, 2018. It's a</p> <p>7 use of force matter. It says "Effective, not</p> <p>8 effective; verbal commands not effective;</p> <p>9 physical constraint, effective; service being</p> <p>10 conducted, arresting."</p> <p>11 And there's -- there's actually</p> <p>12 another one just -- just below it that --</p> <p>13 it's -- it's from the same matter, I believe.</p> <p>14 Because that one says duplicate. And this one</p> <p>15 says "Allegation: Use of force. Force used to</p> <p>16 overcome resistance justified. October 1st,</p> <p>17 2014."</p> <p>18 Do you remember that matter?</p> <p>19 A. No, I don't.</p> <p>20 Q. Okay. But that says justified, so</p> <p>21 there was no finding against you, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. I'm going to scroll down.</p> <p>24 This says "January 26, 2015,</p>

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<p style="text-align: right;">Page 57</p> <p>1 Charges: Use of force; Legal Intervention, 2 1-25-15, justified; vehicle pursuit 1-25-15, 3 justified." 4 Do you remember that -- that 5 incident? 6 A. I don't. 7 Q. Okay. I'm going to scroll down. 8 "Use of force, May 12, 2017; use 9 of force, effective, noneffective; Taser, 10 effective; service being conducted, 302 11 commitment, disposition finding EIP entry." 12 Do you remember that one? 13 A. No, I don't. 14 Q. Okay. Do you remember Tasing 15 someone in a 302? 16 A. I do remember Tasing a female 17 once. I -- I would have -- I would have to 18 assume it may be for what -- in relation to 19 this. 20 Q. Okay. 21 Next one. Use of force, 22 September 13, 2017, CERT-CHEM deployment; 23 Effective." 24 Let's go to the next page to make</p>	<p style="text-align: right;">Page 59</p> <p>1 Do you remember that one? 2 A. No, sir. 3 Q. Okay. The next, January the 9th, 4 2018 allegation, "Dissatisfied with service 5 provided. Counseled." 6 Do you remember that one? 7 A. No, I don't. 8 Q. Did a supervisor in January -- 9 around January 24th of 2018 from the 10 Pennsylvania State Police talked to you about 11 the way you talk to citizens? 12 MR. BRADFORD: Objection to form. 13 You can answer. 14 THE WITNESS: Yes, I believe that 15 was a private complaint through Harrisburg. 16 BY MR. ZEIGER: 17 Q. Do you know what the complaint was 18 about? 19 A. Me wanting to tow vehicle from 20 private property. 21 Q. Why did you want to tow the 22 vehicle? 23 A. Because it was obstruction of the 24 roadway.</p>
<p style="text-align: right;">Page 58</p> <p>1 sure there's nothing else here. 2 Seems like the same one again. 3 CERT-CHEM deployment, not effective; service 4 being conducted, 302 commitment." 5 So, is it -- is a CERT-CHEM 6 deployment meaning you're using mace or pepper 7 spray or some other kind of spray, is that what 8 that means? 9 A. Yes, sir. That just means we're 10 deploying some sort of chemical agent into the 11 residence in order to effect a peaceful 12 resolution. 13 Q. Okay. 14 In this case, it says "It is not 15 effective," meaning it did not work. 16 Do you remember that incident? 17 Did you use some kind of spray in a 302 18 incident? 19 MR. BRADFORD: Objection to form. 20 THE WITNESS: I don't recall. 21 BY MR. ZEIGER: 22 Q. Scrolling down. 23 "October 25, 2017, CERT-CHEM 24 deployment, effective."</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Did you have it towed? 2 A. No. 3 Q. Okay. Moving on. 4 "February 16th of 2018, CERT 5 chemical deployment, not effective" -- 6 MR. ZEIGER: Sorry. We're on to 7 two now. 8 BY MR. ZEIGER: 9 Q. "Service being conducted, 10 arresting; disposition finding information 11 only." 12 Do you remember that job? 13 A. No, sir. 14 Q. Okay. And there's no -- the next 15 one here is January 11, 2019, but before we get 16 that far, I note that the case that we're here 17 for happened on February 23rd, 2018. And I note 18 there's no entry here; is that correct? 19 A. Yes, sir. 20 Q. And so, that means that you did 21 not self-report the use of any force in this 22 case, correct? 23 A. Correct, sir. 24 Q. Do you have a duty to self-report</p>

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<p style="text-align: right;">Page 61</p> <p>1 when you use force?</p> <p>2 MR. BRADFORD: Objection to form.</p> <p>3 You can answer.</p> <p>4 THE WITNESS: Yes, sir, any -- any</p> <p>5 sort of less -- less lethal force, yes.</p> <p>6 BY MR. ZEIGER:</p> <p>7 Q. Okay. And scrolling down in this</p> <p>8 case, you're -- you're claiming you did not use</p> <p>9 any force, right?</p> <p>10 A. Correct, sir.</p> <p>11 Q. Okay. "January 11, 2019, use of</p> <p>12 force, CHEM deployment, effective; service being</p> <p>13 -- service conducted, arresting for information</p> <p>14 only."</p> <p>15 Do you see that?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Okay. And the next one</p> <p>18 "December 30, 2019, CERT-CHEM deployment,</p> <p>19 effective; service being conducted, arresting,</p> <p>20 disposition, information only."</p> <p>21 Do you see that?</p> <p>22 A. Yes, sir.</p> <p>23 Q. That -- you don't remember either</p> <p>24 of those two, do you?</p>	<p style="text-align: right;">Page 63</p> <p>1 Thank you.</p> <p>2 MR. ZEIGER: Which document,</p> <p>3 Kevin?</p> <p>4 MR. BRADFORD: I'll pull it up and</p> <p>5 then you tell me which one it is.</p> <p>6 MR. ZEIGER: Okay.</p> <p>7 MR. BRADFORD: That's not it.</p> <p>8 MR. ZEIGER: That's Wysocky-1.</p> <p>9 MR. BRADFORD: Okay. You got it.</p> <p>10 Wysock-1.</p> <p>11 BY MR. BRADFORD:</p> <p>12 Q. And, Trooper, I want to go back to</p> <p>13 that -- that one sentence that you were asked</p> <p>14 several times about and I -- I highlighted it</p> <p>15 instead of underlining it.</p> <p>16 First of all, can you see that?</p> <p>17 Do you need that bigger?</p> <p>18 A. Can you just -- yes, could you</p> <p>19 just zoom in?</p> <p>20 Thank you, perfect.</p> <p>21 Q. And this is -- this is your</p> <p>22 callout report, right?</p> <p>23 A. Yes, it is.</p> <p>24 Q. I want to direct your attention to</p>
<p style="text-align: right;">Page 62</p> <p>1 A. No, I don't recall.</p> <p>2 Q. All right. So, on this, you agree</p> <p>3 that the number it says total is 12; is that</p> <p>4 right?</p> <p>5 A. Yes.</p> <p>6 Q. All right. Is there anything else</p> <p>7 that -- about this incident that occurred when</p> <p>8 you executed this warrant that you haven't told</p> <p>9 us?</p> <p>10 A. No, sir.</p> <p>11 MR. ZEIGER: I have no further</p> <p>12 questions.</p> <p>13 MR. BRADFORD: I have a couple</p> <p>14 questions, Trooper.</p> <p>15 - - -</p> <p>16 EXAMINATION</p> <p>17 - - -</p> <p>18 BY MR. BRADFORD:</p> <p>19 Q. I'm going to pull up --</p> <p>20 MR. BRADFORD: What was it called</p> <p>21 the report, Brian? Was it Exhibit 1?</p> <p>22 MR. ZEIGER: I'm going -- I'm</p> <p>23 going to unshare that.</p> <p>24 MR. BRADFORD: First of all, yes.</p>	<p style="text-align: right;">Page 64</p> <p>1 the one sentence, "The male was secured and</p> <p>2 Trooper Del Gaizo assisted with applying flex</p> <p>3 cuffs."</p> <p>4 Now, first of all, do you have an</p> <p>5 independent recollection of exactly what you did</p> <p>6 in that room that day?</p> <p>7 A. No.</p> <p>8 Q. Is it fair to say your memory is</p> <p>9 really just based off what you wrote in this</p> <p>10 report?</p> <p>11 A. Yes.</p> <p>12 MR. ZEIGER: Can you hold on for</p> <p>13 one second, Kevin? Hold on. Pardon me.</p> <p>14 - - -</p> <p>15 (Whereupon, a discussion was held</p> <p>16 off the record at this time.)</p> <p>17 - - -</p> <p>18 MR. ZEIGER: Sorry. I -- I had a</p> <p>19 COVID-19 security related issue at my office.</p> <p>20 Go ahead. Sorry about that.</p> <p>21 MR. BRADFORD: Quickly resolved.</p> <p>22 BY MR. BRADFORD:</p> <p>23 Q. Okay. And you -- and you told</p> <p>24 Mr. Zeiger that Del Gaizo assisted in applying</p>

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<p style="text-align: right;">Page 65</p> <p>1 flex cuffs to the male based on the sentence in</p> <p>2 your callout report?</p> <p>3 A. Correct.</p> <p>4 Q. Now, I read this sentence. It</p> <p>5 says "The male was secured and Trooper Del Gaizo</p> <p>6 assisted with applying flex cuffs."</p> <p>7 It doesn't say applying flex cuffs</p> <p>8 to who. Is it possible you were referring to</p> <p>9 the female?</p> <p>10 A. Yes.</p> <p>11 Q. So, is it fair to say that you</p> <p>12 don't know if Trooper Del Gaizo assisted in</p> <p>13 applying flex cuffs to the male?</p> <p>14 A. I'm sorry, what was that? Is it</p> <p>15 fair to say?</p> <p>16 Q. Is it fair to say that you are not</p> <p>17 -- as you sit here today, and even after reading</p> <p>18 this report, and now, reconsidering what's in</p> <p>19 this report based on what I just told you, that</p> <p>20 you're not sure if Trooper Del Gaizo assisted in</p> <p>21 applying flex cuffs to the male?</p> <p>22 A. Yeah. Yes. He assisted with</p> <p>23 applying flex cuffs to all occupants of the</p> <p>24 room.</p>	<p style="text-align: right;">Page 67</p> <p>1 were supposed to be in there, but you</p> <p>2 didn't know -- you had no idea where they would</p> <p>3 actually be located?</p> <p>4 A. Correct.</p> <p>5 MR. BRADFORD: Okay. I'm done,</p> <p>6 Brian.</p> <p>7 - - -</p> <p>8 EXAMINATION</p> <p>9 - - -</p> <p>10 BY MR. ZEIGER:</p> <p>11 Q. Trooper, I mean, your testimony</p> <p>12 today is -- is that Del Gaiz -- Del Gaizo helped</p> <p>13 with you the male, right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Whether -- and that</p> <p>16 includes securing him, right?</p> <p>17 A. Whether he helped me with securing</p> <p>18 or assisting the male or is there some -- some</p> <p>19 way or shape or manner, he -- he assisted me in</p> <p>20 the room with securing the individuals. I -- I</p> <p>21 don't recall to -- to what extent.</p> <p>22 Q. Okay. That includes securing him</p> <p>23 in the bed, flex cuffing them in the bed, taking</p> <p>24 him to the floor and then sitting him up in the</p>
<p style="text-align: right;">Page 66</p> <p>1 Q. Right. And that's what we're</p> <p>2 trying to establish. And that's where we got</p> <p>3 hung up a little bit, is in this report, it says</p> <p>4 "Trooper Del Gaizo assisted with applying flex</p> <p>5 cuffs." It didn't say to whom.</p> <p>6 So, if he said I only applied flex</p> <p>7 cuffs to the female, would that be -- does that</p> <p>8 make sense to you based on this report?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 MR. BRADFORD: Brian, do you want</p> <p>12 to explore this further, you know, we can do</p> <p>13 that after I'm done here.</p> <p>14 And that's actually --</p> <p>15 BY MR. BRADFORD:</p> <p>16 Q. What was the -- what was the</p> <p>17 lighting in the room when -- when you entered</p> <p>18 the room?</p> <p>19 A. I don't recall.</p> <p>20 Q. Is it fair to say you didn't --</p> <p>21 you didn't know the layout of the house at all</p> <p>22 when you entered the house?</p> <p>23 A. Yes.</p> <p>24 Q. So, you only knew the people that</p>	<p style="text-align: right;">Page 68</p> <p>1 chair, all four of those things, you're not sure</p> <p>2 which, but you believe that Del Gaizo helped you</p> <p>3 with some or all of those four, correct?</p> <p>4 A. Yes.</p> <p>5 MR. BRADFORD: You're using</p> <p>6 pronouns. You mean they for both of them?</p> <p>7 You're talking about both people.</p> <p>8 THE WITNESS: They, the male and</p> <p>9 female were secured.</p> <p>10 MR. ZEIGER: Kevin, I'm confused.</p> <p>11 I didn't say that.</p> <p>12 MR. BRADFORD: Yes, you did. You</p> <p>13 said you assisted them. You said them.</p> <p>14 MR. ZEIGER: I'm going --</p> <p>15 I'm going -- I'm going to re -- re -- rephrase</p> <p>16 all this. Okay.</p> <p>17 BY MR. ZEIGER:</p> <p>18 Q. Trooper, I'm only talking about</p> <p>19 the male in the bed. Okay.</p> <p>20 In regard to the male that was in</p> <p>21 the bed, I'm going to call him Joe Kluska.</p> <p>22 Okay?</p> <p>23 A. Yes.</p> <p>24 Q. In regard to Joe Kluska, just to</p>

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<p style="text-align: right;">Page 69</p> <p>1 be clear, your testimony is, in regard to</p> <p>2 securing Joe Kluska in the bed, in regard to</p> <p>3 putting the flex cuffs in Joe Kluska in the bed,</p> <p>4 in regard to moving Joe Kluska onto the floor</p> <p>5 and in regard sitting up Joe Kluska in a chair,</p> <p>6 it's your belief that Officer -- that Trooper</p> <p>7 Del Gaizo helped you do some or all of those</p> <p>8 four things regarding Joe Kluska, correct?</p> <p>9 A. Yes.</p> <p>10 MR. ZEIGER: Thank you. I have</p> <p>11 nothing further.</p> <p>12 - - -</p> <p>13 EXAMINATION</p> <p>14 - - -</p> <p>15 BY MR. BRADFORD:</p> <p>16 Q. And you base that information off</p> <p>17 this single sentence in your call report,</p> <p>18 correct?</p> <p>19 A. Yes. Yes.</p> <p>20 Q. And again, you don't independently</p> <p>21 recall Trooper Del Gaizo making physical contact</p> <p>22 at all with Joe Kluska?</p> <p>23 A. That's correct, yes.</p> <p>24 Q. And would you agree with me that</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. And you would agree that the time</p> <p>2 that you wrote this, this incident was fresher</p> <p>3 in your mind and your memory than it is today,</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. And this is your report and you</p> <p>7 authored it, right?</p> <p>8 A. Yes.</p> <p>9 Q. You were the typist, right?</p> <p>10 A. Yes.</p> <p>11 Q. And you had full and fair</p> <p>12 opportunity to read it and proofread it and add</p> <p>13 anything else in that you wanted at that time,</p> <p>14 right?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And I asked you today if there</p> <p>17 were any mistakes or omissions in this report</p> <p>18 and you said no to both of those, correct?</p> <p>19 A. Correct.</p> <p>20 MR. ZEIGER: I have nothing</p> <p>21 further.</p> <p>22 MR. BRADFORD: Okay. I'm done</p> <p>23 with it.</p> <p>24 MR. ZEIGER: All right.</p>
<p style="text-align: right;">Page 70</p> <p>1 this sentence in your -- in your callout report</p> <p>2 could be interpreted in a fashion that Trooper</p> <p>3 Del Gaizo assisted in applying flex cuffs only</p> <p>4 to the female?</p> <p>5 A. Yes.</p> <p>6 Q. So, the bottom line is, you're not</p> <p>7 sure if Trooper Del Gaizo, as you sit here</p> <p>8 today, lay a hand on Joe Kluska while you were</p> <p>9 in that room?</p> <p>10 A. That's correct.</p> <p>11 MR. BRADFORD: Okay. Thank you.</p> <p>12 - - -</p> <p>13 EXAMINATION</p> <p>14 - - -</p> <p>15 BY MR. ZEIGER:</p> <p>16 Q. Would you agree with me, Trooper,</p> <p>17 that you authored this report about -- within</p> <p>18 four days of when this incident occurred,</p> <p>19 correct -- five days?</p> <p>20 A. I did, yes.</p> <p>21 Q. And you would agree that now,</p> <p>22 we're about two-and-a-half years later, after</p> <p>23 this happened, right?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 72</p> <p>1 Officer -- stay safe, Trooper.</p> <p>2 VIDEO TECHNICIAN: Are you</p> <p>3 ready --</p> <p>4 THE WITNESS: Thank you, sir.</p> <p>5 VIDEO TECHNICIAN: Before he</p> <p>6 leaves the room, are we ready to do the</p> <p>7 conclusion of his deposition?</p> <p>8 MR. ZEIGER: Yes.</p> <p>9 VIDEO TECHNICIAN: Okay. One</p> <p>10 moment, please.</p> <p>11 All right, everyone. This</p> <p>12 concludes the videoconference deposition of</p> <p>13 Trooper Wysocky. We ask that all participants</p> <p>14 handle their transcript and video orders later.</p> <p>15 We are going off the video record</p> <p>16 on October 1, 2020 at 12:18 p.m.</p> <p>17 MR. ZEIGER: I need PDF of the</p> <p>18 manuscript and I need the video in the cheapest</p> <p>19 format.</p> <p>20 (Witness excused.)</p> <p>21 (Deposition concluded at 12:18</p> <p>22 p.m.)</p> <p>23</p> <p>24</p>

TROOPER MATTHEW WY SOCKY  
ANGLEMEYER, ET AL. vs NORTHAMPTON COUNTYOctober 01, 2020  
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Page 73	
1	CERTIFICATE
2	
3	I HEREBY CERTIFY that the witness
4	was duly sworn by me and that the deposition is
5	a true record of the testimony given by the
6	witness.
7	
8	<i>Torre Lynn Adams</i>
9	
10	Torre Lynn Adams,
11	Court Reporter and Notary Public
12	Dated: October 15, 2020
13	
14	
15	
16	(The foregoing certification of
17	this transcript does not apply to any
18	reproduction of the same by any means, unless
19	under the direct control and/or supervision of
20	the certifying reporter.)
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Page 74	
1	LAWYER'S NOTES
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